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May 18, 1998

Dr. C. W. Jameson
National Toxicology Program
Report on Carcinogens
MD EC-14
79 Alexander Drive
Building 4401, Room 3127
Research Triangle Park, NC 27709

Via: Federal Express

Dear Dr. Jameson:

I am writing to you on behalf and with the approval of Cumberland Packing Corp., the makers of Sweet'N Low®, to urge you to delist saccharin from NTP's Annual Report on Carcinogens. Sweet'N Low® is the leading brand of saccharin-based sugar substitutes in the USA. Cumberland Packing Corp. is today one of the largest purchasers of saccharin in the USA.

We at Sweet'N Low® firmly believe that saccharin is not a human carcinogen. Our belief is based on the overwhelming scientific evidence that has been submitted to and reviewed by NTP and on the conclusion reached by distinguished scientific bodies which reviewed the safety of saccharin. Among the scientific bodies we include:

- The Joint Expert Committee on Food Additives (JECFA) of the World Health Organization. In its meeting in 1993, JECFA concluded that "it would be inappropriate to consider the bladder tumors induced in male rats by sodium saccharin to be relevant to the assessment of toxicological hazards to humans." Since JECFA's meeting, additional scientific evidence has been generated that further supports this conclusion.
- The European Committee on Food Additives reviewed the safety of saccharin in 1995 and affirmed that it is safe for human consumption.
- The American Institute for Cancer Research published a report entitled "Food, Nutrition and the Prevention of Cancer: a global perspective" in 1997. A distinguished body of scientists, including leading epidemiologists, reviewed the safety of artificial sweeteners and concluded "based on the large amount of epidemiological data, the evidence shows that consumption of saccharin probably has no relationship with the risk of bladder cancer in the amounts obtainable from normal diets."

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- Finally, NTP's review groups, RG1 and RG2, reviewed the scientific evidence on saccharin and reached the conclusion that saccharin is not reasonably anticipated to be a human carcinogen and recommended delisting it from NTP's Annual Report on Carcinogens.

We, at Sweet'N Low®, have listened to the deliberations of NTP's Board of Counselor's meeting on October 31, 1997 and reviewed the transcripts of that meeting. We were dismayed and disappointed by the inaccurate information presented and discussed during the meeting; e.g., the consumption data mentioned below. Furthermore, we were highly surprised at the risk assessment issues which dominated the discussion. These issues, we believe, were not relevant to the deliberations nor were within the purview of the Committee. We agree with Dr. Allaben's comments on this matter "This committee is charged with reviewing the information provided to them with regard to mechanistic information and whether or not mechanistic information supports the delisting nomination or the petition. It is not charged with conducting risk assessments".
(transcripts page 69, lines 12-18)

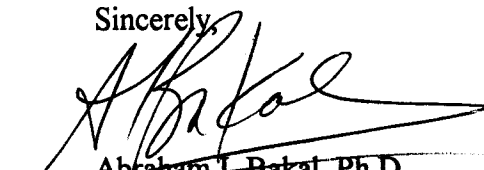
Even though concerns regarding intake should not factor into these deliberations, the information presented to the Committee on this matter was outdated and inaccurate. Dr. Maronpot, speaking about saccharin consumption, suggested that current saccharin consumption has increased 30%, basing his estimate on 1977 USDA data and total current saccharin production figures. Apparently, Dr. Maronpot was not aware of the widespread use of saccharin in non-food products and applications, which account for increases in saccharin production. The impression left with members of the committee and the public was that saccharin intake is going up. In reality, the intake of saccharin has been going down for years due to the substitution of saccharin with other approved intense sweeteners in low calorie foods such as soft drinks, chewing gums, candies, tabletop sugar substitutes and others. It is practically impossible to find saccharin sweetened products, other than tabletop sugar substitutes, in the supermarkets and other retail establishments today.

There are more than 40 million loyal customers who use Sweet'N Low® daily. These consumers represent a wide spectrum of individuals who must or choose to restrict their sugar or caloric intake for health or other reasons or consumers who just prefer the taste of Sweet'N Low® over other tabletop sweeteners. Further, Sweet'N Low® today remains the only widely available heat stable sweetener for cooking or baking. These individuals expect their regulatory agencies to base their decisions on good science and to have the wisdom and courage to adapt their decisions to the new scientific evidence. A reversal of an existing policy when based on good and current scientific evidence can only serve to enhance consumer confidence in the regulatory process.

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We urge you to accept the opinion of the overwhelming majority of scientists who have studied saccharin and to conclude that saccharin is not reasonably anticipated to be a human carcinogen. Such action, we believe, will go a long way in assuring the public that scientific conclusions reached by NTP are based solely on the scientific evidence.

Sincerely,



Abraham I. Bakal, Ph.D.
President

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